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September 17, 2015

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (REG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“New GM”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically, today, September 17, 2015, the following letters were filed in MDL 2543 pending in the United States District Court for the Southern District of New York:

1. A letter regarding the issue of settlement as it relates to certain post-363 Sale personal injury and wrongful death lawsuits pending in MDL 2543; and
2. A letter regarding the issue of settlement as it relates to (i) the Department of Justice’s investigation of New GM involving the ignition switch; and (ii) the pending putative securities class action against New GM (*New York State Teachers’ Retirement System v. General Motors LLC, et al.*, No. 14-cv-11191 (E.D. Michigan).

Copies of the two letters referenced above are attached hereto as Exhibits “1” and “2,” respectively.

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Respectfully submitted,

*/s/ Arthur Steinberg*

Arthur Steinberg

AJS/sd  
Encl.

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